

retroactive lost wages/benefits, front pay/future lost wages, emotional distress damages, medical/medical insurance expenses, attorney's fees/costs, interest, punitive damages, and such other damages in an amount which will fully and fairly compensate him, and such other relief as the Honorable Court may deem fair and just.

COUNT II - VIOLATION OF M.G.L. c. 151B
UNLAWFUL RETALIATION AGAINST
DEFENDANT STEPPINGSTONE, INC.

50. The Plaintiff repeats, re-alleges and incorporates by reference, all information recited above, as if set forth herein

51. M.G.L. c. 151 B §4(4) makes it unlawful for any person, employer, labor organization, or employment agency to discharge, expel, or otherwise discriminate against any person because he has opposed any practices forbidden under Chapter 151B or because he has filed a complaint, testified or assisted in any proceeding under c. 151B §5.

52. Defendant Steppingstone, Inc., through its acts and those of its agents, violated c. 151B §4(4) by discharging and otherwise discriminating against the Plaintiff, because he had opposed and complained of practices forbidden by c. 151B.

53. Defendant Steppingstone, Inc., through its acts and those of its agents, violated c. 151B §4 (4) by discharging and otherwise discriminating against the Plaintiff because he had opposed and complained of practices forbidden by c. 151B., through outrageous, malicious, oppressive conduct, in reckless disregard of the Plaintiff's rights or in callous indifference to the rights of the Plaintiff. Accordingly, the Plaintiff is entitled to punitive damages pursuant to c.151B §9.

54 As a result of the conduct of Defendant Steppingstone, Inc, the Plaintiff has been greatly damaged and has suffered and continues to suffer great mental anguish, loss of enjoyment of life, severe and continuing emotional distress, lost past and future wages/benefits, medical expenses, loss of personal and professional reputations, economic hardship, attorney's fees/costs, and has been otherwise damaged.

WHEREFORE, the Plaintiff hereby demands judgment for reinstatement into his position, via injunctive relief, or an acceptable substantially equivalent position, retroactive lost wages/benefits, front pay/future lost wages, emotional distress damages, medical/medical insurance expenses, attorney's fees/costs, interest, punitive damages,

and such other damages in an amount which will fully and fairly compensate him, and such other relief as the Honorable Court may deem fair and just.

COUNT IV - VIOLATION OF M.G.L. c. 151B
UNLAWFUL HANDICAP DISCRIMINATION AGAINST
DEFENDANT KATHLEEN SCHEDER-CLARK

55. The Plaintiff repeats, re-alleges and incorporates by reference, all information recited above, as if set forth herein

56. Pursuant to M.G.L. c. 151B §4 (4A) the law prohibits any person from coercing, intimidating, threatening, or interfering with another person in the exercise or enjoyment of any right granted or protected by Chapter 151B. Defendant Kathleen Schedler-Clark unlawfully committed such afore described acts against and otherwise discriminating against the Plaintiff because of his handicap.

57. Pursuant to M.G.L. c. 151B §4 (5) the law prohibits any person, whether an employer or employee or not, to aid, abet incite, compel, or coerce the doing of any of the acts forbidden under C. 151B or to attempt to do so. Defendant Kathleen Schedler-Clark unlawfully committed such afore described acts against the Plaintiff in the course of his employment by dismissing from employment and otherwise

discriminating against the Plaintiff because of his handicap.

58. Defendant Kathleen Schedler-Clark violated c. 151B §4 (16) by dismissing the Plaintiff from employment and otherwise discriminating against him, because of his handicap, through outrageous, malicious, oppressive conduct, in reckless disregard of the Plaintiff's rights or in callous indifference to the rights of the Plaintiff. Accordingly, the Plaintiff is entitled to punitive damages pursuant to c. 151B §9.

59. As a result of the conduct of Defendant Kathleen Schedler-Clark, the Plaintiff has been greatly damaged and has suffered and continues to suffer great mental anguish, loss of enjoyment of life, severe and continuing emotional distress, lost past and future wages/benefits, medical expenses, loss of personal and professional reputations, economic hardship, attorney's fees/costs, and has been otherwise damaged.

WHEREFORE, the Plaintiff hereby demands judgment for reinstatement into his position, via injunctive relief, or an acceptable substantially equivalent position, retroactive lost wages/benefits, front pay/future lost wages, emotional distress damages, medical/medical insurance expenses, attorney's fees/costs, interest, punitive damages, and such other damages in an amount which will fully and fairly compensate him, and

such other relief as the Honorable Court may deem fair and just.

COUNT III - VIOLATION OF M.G.L. c. 151B
UNLAWFUL RETALIATION AGAINST
DEFENDANT KATHLEEN SCHEDLER-CLARK

60. The Plaintiff repeats, re-alleges and incorporates by reference, all information recited above, as if set forth herein

61. M.G.L. c. 151 B §4(4) makes it unlawful for any person, employer, labor organization, or employment agency to discharge, expel, or otherwise discriminate against any person because he has opposed any practices forbidden under Chapter 151B or because he has filed a complaint, testified or assisted in any proceeding under c. 151B §5.

62. Defendant Kathleen Schedler-Clark, violated c. 151B §4(4) by discharging and otherwise discriminating against the Plaintiff, because he had opposed and complained of practices forbidden by c. 151B.

63. Defendant Kathleen Schedler-Clark violated c. 151B §4 (4) by discharging and

otherwise discriminating against the Plaintiff because he had opposed and complained of practices forbidden by c. 151B., through outrageous, malicious, oppressive conduct, in reckless disregard of the Plaintiff's rights or in callous indifference to the rights of the Plaintiff. Accordingly, the Plaintiff is entitled to punitive damages pursuant to c.151B §9.

64. As a result of the conduct of Defendant Kathleen Schedler-Clark, the Plaintiff has been greatly damaged and has suffered and continues to suffer great mental anguish, loss of enjoyment of life, severe and continuing emotional distress, lost past and future wages/benefits, medical expenses, loss of personal and professional reputations, economic hardship, attorney's fees/costs, and has been otherwise damaged.


WHEREFORE, the Plaintiff hereby demands judgment for reinstatement into his position, via injunctive relief, or an acceptable substantially equivalent position, retroactive lost wages/benefits, front pay/future lost wages, emotional distress damages, medical/medical insurance expenses, attorney's fees/costs, interest, punitive damages, and such other damages in an amount which will fully and fairly compensate him, and such other relief as the Honorable Court may deem fair and just.

JURY CLAIM

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully filed this 14th day of September, 2004.

Plaintiff,
GREGORY SOARES,
By His Attorneys


CHRISTOPHER JAMES LOWRIE
47 Mechanics Lane
New Bedford, MA 02740
(508) 990-7980
Fax: (508) 991-5589
BBO #306380


SUSAN S. ANDREW, Esq.
47 Mechanics Lane
New Bedford, MA 02740
(508) 990-7980
Fax: (508) 991-5589
BBO # 643064